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October 2, 2001

Ms. Carol Hanlon  
S&ER Projects Manager  
U. S. Department of Energy  
Yucca Mountain Site Characterization Office  
P. O. Box 30307 M/S 025  
North Las Vegas, NV 89036-0707

Dear Ms. Hanlon,

Subject: Comments on the Yucca Mountain Preliminary Site Suitability Evaluation

This Evaluation provides the results of a sound scientific analysis of the suitability of Yucca Mountain for disposal of spent fuel and high-level radioactive waste. After years of study and research, as well as extensive public reporting of the findings and conclusions, this documentation now provides the basis on which the President can recommend the Yucca Mountain site for its radioactive waste disposal mission.

There is no honest scientific doubt that the site will provide reasonable assurance of safety over geologic time. Is anyone ever going to be hurt by radiation from technetium?

This process will gather a huge number of comments. Seeking and reviewing comments from the public is an established part of our process in this country for reaching major Federal decisions. It is important to assure the right of the public to be heard.

The right to be heard must not be confused with an obligation to be obeyed. It is the responsibility of the DOE and of the administration to see that the facts have been gathered and scientifically evaluated, that environmental and health tradeoffs have been considered, and that the economic and energy impacts of decisions have been responsibly weighed.

This does not mean that an unsafe facility should be permitted. It means that as a society we must understand that safety is not an absolute quantity. Safety has to be weighed as do other attributes, and kept in perspective. Zero risk is not, and cannot be, a requirement.

Many of the comments DOE will receive are familiar and have been heard for years. They will call for lower risk, even zero risk. But what is the impact of such demands? Do they have anything to do with public health and safety? Hardly!

Their objective is to make it harder for nuclear power to play a role in providing a portion the future electricity needs of society. This may be popular among a good many voters, but it is not good environmental policy, energy policy or national policy.

The DOE and the President are under an obligation to future Americans to base their decision on scientific findings. Those of us who understand nuclear science and technology are counting on them to do this.

Sincerely,



A. David Rossin

Biographical information:

Assistant Secretary for Nuclear Energy, U. S. Department of Energy 1986-87  
Director of the Nuclear Safety Analysis Center at EPRI 1981-86  
President of the American Nuclear Society 1992-93.

Ph. D. Metallurgy, Case-Western Reserve University, 1966  
MBA, Northwestern Univ. 1963  
M. S. Nuclear Engineering, MIT, 1955  
B. Engineering Physics, Cornell Univ. 1954

During my career, I worked on nuclear reactor safety, effects of radiation on materials and many aspects of the nuclear power fuel cycle, including nonproliferation. During the 1970's when I was Director of Research for Commonwealth Edison Co. I was Chairman of the corporate Waste Task Force, and served on many committees dealing with spent fuel, and both low-level and high-level radioactive waste.

I am an independent consultant on nuclear power safety, energy policy and nonproliferation. Currently I am Center Affiliated Scholar at the Center for International Security and Cooperation at Stanford, working on a book on the U. S. policy as formulated by Jimmy Carter to oppose reprocessing of spent civilian nuclear power reactor fuel.